



# Air Resources Board

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**Matthew Rodriguez**  
Secretary for  
Environmental Protection

**Mary D. Nichols, Chairman**  
1001 I Street • P.O. Box 2815  
Sacramento, California 95812 • [www.arb.ca.gov](http://www.arb.ca.gov)

**Edmund G. Brown Jr.**  
Governor

November 6, 2012

Mr. Wayne Allard  
Vice President, Government Relations  
American Motorcyclist Association  
[wallard@ama-cycle.org](mailto:wallard@ama-cycle.org)

Dear Mr. Allard:

Thank you for your letter of October 16th to Air Resources Board (ARB) Chairman Mary Nichols, wherein you expressed concern about potential misfueling of E15 into motorcycles and all-terrain vehicles, which are not approved for E15 use. Chairman Nichols has asked me to respond to your letter.

As you stated, misfueling is possible through blender pumps that dispense both E10 and E15 when residual E15 is left in the dispenser hose. To address potential misfueling issues with non-approved vehicles, the U.S. Environmental Protection Agency (U.S. EPA) approved a Misfueling Mitigation Plan that, as one of its conditions, mandates consumers purchase at least four gallons of E10 fuel if purchasing from a blender pump that dispenses both E10 and E15. Your concern is that motorcycles have small gas tanks; therefore, the four-gallon minimum purchase is problematic. Consequently, the chance of putting fuel into these vehicles with an ethanol content higher than E10 is still of concern.

Please be advised that E15 is not approved for sale in California, and if ARB chooses to allow E15 as a transportation fuel, it would take several years to complete the vehicle testing and rule development necessary to introduce a new transportation fuel into California's market. Meanwhile, U.S. EPA has committed to "closely follow the results of their E15 Compliance Survey to determine whether additional misfueling mitigation measures are necessary." We will follow U.S. EPA's continued assessment of E15 misfueling and will keep in mind these concerns should we move forward with allowing E15 in California.

*The energy challenge facing California is real. Every Californian needs to take immediate action to reduce energy consumption. For a list of simple ways you can reduce demand and cut your energy costs, see our website: <http://www.arb.ca.gov>.*

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California Environmental Protection Agency

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Thank you again for writing. If you have any questions or need further information, please contact me at (916) 322-6020 or by email at [mwaugh@arb.ca.gov](mailto:mwaugh@arb.ca.gov).

Sincerely,

A handwritten signature in black ink that reads "Michael S. Waugh". The signature is written in a cursive style with a large, prominent initial "M".

Michael S. Waugh, Chief  
Transportation Fuels Branch